



**LOUISVILLE METRO
AIR POLLUTION CONTROL DISTRICT
850 Barret Ave., Louisville, Kentucky 40204**



**xx xx, 2014
FEDOOP Statement of Basis**

Company: Whayne Supply Company

Plant Location: 1400 Cecil Ave, Louisville, Kentucky 40211

Date Application Received: 07/26/2006 and 04/09/2014

Date of Draft Permit: 07/01/2014

Date of Public Notice: 07/02/2014

District Engineer: Shannon Hosey

Permit No: 113-01-F (R2)

Plant ID: 662

SIC Code: 7532

NAICS: 811121

AFS: 00662

Introduction:

This permit will be issued pursuant to District Regulation 2.17, *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}) and partial non-attainment area for sulfur dioxide (SO₂).

Application Type/Permit Activity:

☐ Initial Issuance

☐ Permit Revision

☐ Administrative

☐ Minor

☐ Significant

☒ Permit Renewal

Compliance Summary:

☒ Compliance certification signed

☐ Compliance schedule included

☐ Source is out of compliance

☒ Source is operating in compliance

I. Source Information

1. **Source Description:** Automotive refinishing and miscellaneous metal parts surface coating.

2. **Emission Unit Summary:**

Emission Unit	Equipment Description
U1	One (1) Group II site-constructed spray paint booth equipped with dry filters and related spray equipment. No drying oven. Two (2) spray paint booths for miscellaneous metal parts, including one Binks PFA-8-7-T-LH and one Binks 883-2448 equipped with dry filters and related spray equipment. No drying oven.
U2	One (1) Empire Portable Sandblaster, Model P-300
U3	One (1) 6000 gallon underground gasoline storage tank for fueling motor vehicles
IA-1	Fourteen (14) caustic parts washers and one (1) cold solvent parts washing operation

3. **Fugitive Sources:** There are no fugitive emissions.

4. **FEDDOOP Permit 194-05-F (R1) Revisions/Changes:**

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./ Page No.	Description
N/A	04/22/1997	03/16/1997	Initial	Entire Permit	Initial Permit Issuance
R1	06/30/2004	04/11/2004	Minor	152-94 12-04	Incorporate Construction Permit 16-03-C; Revise periodic monitoring requirements; and Incorporate Stage I requirements
R2		07/02/2014	Renewal	Entire Permit	Renew FEDDOOP and incorporate Construction Permit 25-10-C, 36646-12-C and STAR exemption request

5. Emission Summary:

Pollutant	Actual Emissions (tpy) 2009 Data	Pollutant that triggered major source status
CO	0	No
NO_x	0.03	No
SO₂	0.05	No
PM₁₀	0.12	No
VOC	1.14	Yes
Single HAP	0.017	Yes
Total HAPs	0.11	Yes

6. Applicable Requirements:

☐ PSD ☐ 40 CFR 60 ☒ SIP ☒ 40 CFR 63
☐ NSR ☐ 40 CFR 61 ☒ District-Origin ☐ Other

7. Future MACT Requirements: NA**8. Referenced Federal Regulations in Permit:**

40 CFR 63, Subpart CCCCCC National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

40 CFR 63, Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

II. Regulatory Analysis

- 1. Acid Rain Requirements:** Wayne Supply Company is not subject to the Acid Rain Program.
- 2. Stratospheric Ozone Protection Requirements:** Wayne Supply Company does not manufacture, sell, or distribute any of the chemicals listed in title VI of the CAAA. Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

3. **Prevention of Accidental Releases 112(r):** Wayne Supply Company does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount.

4. **Basis of Regulation Applicability**

Regulation	Basis for Applicability
2.17	Federally Enforceable District Origin Operating Permits
6.09	Regulation 6.09 establishes emission standards for processes that emit PM which were constructed before September 1, 1976.
6.18	Applies to each cold cleaners, open top vapor degreasers, and conveyorized degreasers that use volatile organic compounds (VOCs) to remove soluble impurities from metal surfaces.
6.31	Regulation 6.31 applies to existing painting for metal parts and product surface coating operations commenced before May 20, 1981.
6.40	Regulation 6.40 applies to the refueling of motor vehicles at a gasoline dispensing facility.
6.44	Regulation 6.44 applies to existing commercial motor vehicle and mobile equipment refinishing operations.
7.08	Regulation 7.08 establishes emission standards for processes that emit PM which were constructed after September 1, 1976.
7.15	Regulation 7.15 applies to the transfer of VOC from transport tanks into storage tanks constructed after June 13, 1979
40 CFR 63, Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities
40 CFR 63, Subpart HHHHHH	National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

a. **Plant-wide major source limits**

Wayne Supply Company requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and < 5.0 tpy of largest single HAP, to be a FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.

b. Equipment:

EU	Emission Process	Description Make/Model	Applicable Regulation	Control Device
U1	E1	Group II Spray Paint Booth	6.09, 6.31, 6.44, 7.08 and 40 CFR 63, Subpart HHHHHH	Dry Filters
	E2	Paint Spray Booth #1		
	E3	Paint Spray Booth #2		
U2	E4	Empire Portable Sandblaster	7.08	N/A
U3	E11	6000 Gallon Gasoline Storage Tank	6.40, 7.15 and 40 CFR 63, Subpart CCCCCC	N/A
IA-1	Parts Cleaners	Fourteen (14) caustic parts washers Cold solvent parts washing operation consisting of thirty (30) parts washers.	6.18	N/A

c. Standards/Operating Limits**i. VOC**

- 1) Regulation 2.17, section 5.1, allows the source to set a synthetic limit below the major source threshold. The source has requested a synthetic limit of less than 25 tons per year of the pollutant VOC to be exempt from STAR.
- 2) Regulation 6.44, section 4.1 specifies VOC content limits for all coatings used in the paint booths.
- 3) Regulation 6.40, section 2.2.1 requires the source not to exceed 10,000 gallons of throughput per month.
- 4) Per Regulation 7.15, the owner or operator shall observe specific operating requirements, and shall install, maintain and operate the storage tank with submerged fill pipe, vent line restrictions, a vapor balance system.
- 5) Per Regulation 6.31, VOC emissions are limited to 5 tons per 12 consecutive month period.
- 6) Per Regulation 6.18, the owner or operator shall observe specific operating requirements, and shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F).

ii. **Opacity**

Regulation 6.09, section 3.3.1 and Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.

iii. **PM**

For emission processes subject to Regulation 6.09 and Regulation 7.08 for PM, the PM emission standards are calculated per section 3.1.2 and 3.2. The equation to calculate the hourly PM emission limit is $E = 4.10 P^{0.67}$ for 6.09 or $E = 3.59 * P^{0.62}$ for 7.08, where E is the allowable lb/hr PM emission limit and P is the process weight rate expressed in tons/hr.

iv. **HAP**

- 1) Regulation 2.17, section 5.1, allows the source to set a synthetic limit below the major source threshold. The source has requested synthetic limits of less than 5 tons per year of any individual HAP and less than 12.5 tons per year of total HAPs to be exempt from STAR.
- 2) Per Regulation 5.02, section 4.111, the source is subject to 40 CFR 63, Subpart CCCCCC and is required to comply with section 63.11116.
- 3) Per Regulation 5.02, section 4.116, the source is subject to 40 CFR 63, Subpart HHHHHH and is required to comply with section 63.11173.

d. **Monitoring and Record Keeping**

i. **VOC**

Emissions Calculation Methodology: The emission calculations are based upon the material usage rate and the VOC content as applied.

Regulation 2.17, section 5.2 requires sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

ii. **Opacity**

Regulation 6.09 and 7.08 do not require any specific monitoring or record keeping requirements for opacity. However, Regulation 2.17, section 5.2 establishes requirements for sufficient monitoring

and record keeping to assure ongoing compliance with the terms and conditions of the permit. The source is required to conduct a monthly visible emission survey and maintain records of the results to assure ongoing compliance with the opacity standard.

iii. **PM**

Regulation 6.09 and 7.08 do not require any specific monitoring or record keeping requirements for PM. However, Regulation 2.17, section 5.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

iv. **HAP**

- 1) Regulation 2.17, section 5.1 establishes the requirement to include specific conditions in the permit to limit the plant-wide emissions of individual and total combined HAPs to be FEDOOP STAR Exempt.
- 2) The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart CCCCCC and HHHHHH.

e. **Reporting**

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued to submit an Annual Compliance Certification by April 15. In addition, as required by Regulation 2.17, section 5.2, the source shall submit an annual compliance report to show compliance with the standards by March 1, of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

i. **VOC**

Regulation 2.17, section 5.2 requires reporting to assure compliance with the terms and conditions of the permit.

ii. **Opacity**

Regulation 6.09 and 7.08 do not require any specific reporting requirements for opacity. However, Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report

any deviation from the requirement to perform monthly VE surveys or Method 9 tests and the occurrences of VE surveys where visible.

iii. **PM**

Regulation 6.09 and 7.08 do not require any specific reporting requirements for PM. However, Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **HAP**

- 1) Regulation 2.17, section 5.2 requires sufficient reporting to assure ongoing compliance with the terms and conditions of the permit.
- 2) The source is required to comply with applicable reporting requirements of 40 CFR Part 63, Subpart CCCCCC and HHHHHH.

III. Other Requirements

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Alternative Operating Scenarios:** The source did not request to operate under any alternative operating scenarios.
5. **Compliance Status:** Wayne Supply Company is currently in compliance.
6. **Compliance History:** There are no records of any violations of the terms of the present or prior construction or operating permits.

7. Insignificant Activities

Description	Quantity	Basis
VOC storage tanks 250 gal or less	3	Regulation 1.02, Appendix A, section 3.24
Storage tanks fuel or lubrication oil with V.P. < 10 MM HG at 20° Celsius	34	Regulation 1.02, Appendix A, section 3.9.2
Pressurized VOC storage vessels	1	Regulation 1.02, Appendix A, section 3.26
Storage tanks – diesel or fuel oil – Not for sale resale or distribution – Annual turnover 2X Capacity	5	Regulation 1.02, Appendix A, section 3.25
Combustion sources < 10 MMBtu/hr	172	Regulation 1.02, Appendix A, section 1.1
Brazing, Soldering, or Welding Equipment, potential emissions less than 5 tpy of a regulated pollutant or 1000 lbs/year of a HAP	2	Regulation 1.02, Appendix A, section 3.4
Lab Ventilating & Exhausting Systems Non-Radioactive Materials, potential emissions less than 5 tpy of a regulated pollutant or 1000 lbs/year of a HAP	1	Regulation 1.02, Appendix A, section 3.11
Equipment used exclusively for heat treating, soaking, case hardening or surface conditioning of metal objects when natural gas or LP gas is used as fuel.	1	Regulation 1.02, Appendix A, section 3.14
Equipment used for washing or drying products fabricated from metal or glass provided no volatile organic materials are used in the process and no oil or solid fuel is burned.	2	Regulation 1.02, Appendix A, section 3.15
Parts Washers	44	Regulation 1.02, section 1.38.1.1
Waste Oil Furnaces	6	Regulation 1.02, section 1.38.1.1

1. Insignificant Activities identified in District Regulation 1.02, Appendix A may be subject to size or production rate disclosure requirements.
2. Insignificant Activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
3. Activities identified in Regulation 1.02, Appendix A, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have

generally applicable requirements that continue to apply to the source and must be included in the permit.

4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
5. In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE) as the annual emission for each piece of equipment.
6. The owner or operator shall annually submit an updated list of Insignificant Activities, including an identification of the additions and removals of Insignificant Activities that occurred during the preceding year, with the compliance certification due April 15th.